

January 14, 2015

Via ECF

The Honorable Ramon E. Reyes, Jr.
United States District Court
Eastern District of New York
225 Cadman Plaza East, Rm. N208
Brooklyn, New York 11201

Re: *Gigantino v. Turner Construction, et al.*
Civil No. 14-3619
GS File No. 4106.0008

Dear Judge Reyes,

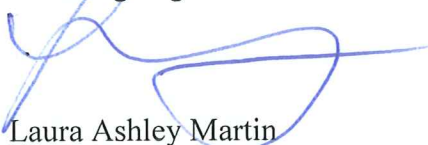
We represent Defendants Turner Construction Company and Delta Airlines, Inc. (hereinafter "Defendants") in the above-referenced Labor Law matter. We submit this joint letter on behalf of all parties requesting a modification of the current scheduling order pursuant to the recent conference call with the Court.

The parties respectfully request that the scheduling order be modified as follows:

- Liability fact discovery, including the parties' depositions, shall be completed on or before March 6, 2015.
- Plaintiff's liability expert(s) witness disclosures are due on or before March 20, 2015.
- Plaintiff's liability expert(s) depositions shall be completed on or before April 3, 2015.
- Defendants' liability expert(s) witness disclosures are due on or before April 17, 2015.
- Defendants' liability expert(s) depositions shall be completed on or before May 1, 2015.
- Liability discovery shall be completed on or before May 8, 2015.
- A status conference with the Court will be held on _____.
- All discovery shall be completed on or before _____.

We are available at the Court's convenience to discuss this matter further.

Respectfully submitted,
Goldberg Segalla LLP



Laura Ashley Martin

LAM

CC: Michael S. Fabiani, Esq. (via ECF)
Kreindler & Kreindler, LLP
750 Third Avenue
New York, NY 10017